

**Daniel
Wall/SUPR/R7/USEPA/US**
12/05/2005 03:41 PM

To wherst
cc darrick.steen, Cheryle Micinski
bcc
Subject Fw: West Lake Landfill OU-2

Ward,

- Attached below are comments I received from Darrick Steen with MDNR on the RAO Memo. I'd like to have a conference with you and Darrick to talk through these comments and reach some agreement on how to address these. Are you available anytime this week?

Dan Wall
913-551-7710

----- Forwarded by Daniel Wall/SUPR/R7/USEPA/US on 12/05/2005 03:34 PM -----

Darrick Steen
<darrick.steen@dnr.mo.gov>
12/01/2005 03:30 PM

To Daniel Wall/SUPR/R7/USEPA/US@EPA
cc Scott Waltrip <scott.waltrip@dnr.mo.gov>, tim.duggan@ago.mo.gov
Subject West Lake Landfill OU-2

Dan,

Attached are my comments regarding the Memorandum of Remedial Action Objectives for OU-2 at West Lake Landfill. As promised, I have a comment regarding the impact that OU-2 landfill gas issues will have upon radon gas from OU-1. Give me a call if needed to discuss.

Darrick H. Steen
Missouri Department of Natural Resources
Hazardous Waste Program
Federal Facilities Section
Phone: (573) 751-3087 Fax: (573) 526-5268



Email: darrick.steen@dnr.mo.gov 2005 1201 Westlake OU-2 letter.pdf

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

December 1, 2005

Mr. Dan Wall
U.S. EPA, Region VII
901 N. 5th Street
Kansas City, KS 66101

RE: Memorandum of Remedial Action Objectives, West Lake Landfill Operable
Unit 2, Bridgeton, Missouri

Dear Mr. Wall:

The Missouri Department of Natural Resources has reviewed the above referenced memorandum and are transmitting the comments below for consideration and response.

- **OU-2 Site Boundary** – It is not clear how the scope of the RI/FS and ROD will address the different areas of OU-2. The above referenced letter states that the demolition landfill area and the active permitted area are part of OU-2, yet they are excluding these areas from the FS. Since all of these areas are inter-connected via land, groundwater, landfill gas flow etc., shouldn't the area as a whole be analyzed in the FS in order to see the big picture? For example, shouldn't there be a discussion on how the active landfill gas collection system will impact landfill gas at the inactive site. This applies to groundwater and the leachate pumps also.
- **Landfill Gas** – Radon gas is not included as a potential landfill gas. How does radon gas generated in OU-1 effect OU-2? In what ways will the active landfill gas collection system or any other OU-2 remedial alternative effect radon gas flow? Will radon gas mix with other landfill gases and migrate onto OU-2? Will it migrate off-site?
- **Landfill Gas Collection** – The active permitted landfill has an operating gas collection system. Why not tie OU-2 into this system? There needs to be a discussion on how systems (gas collection, leachate collection, etc) at the active permitted landfill will or could impact or compliment the remedy for OU-2.
- **O&M and IC's** – Although not listed as a remedial action objective, operation and maintenance that includes institutional controls must be an essential part of the alternatives in the FS.

Mr. Dan Wall
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Thank you for giving us the opportunity to review and comment on this document. If you have any questions or need further clarification, please call me at (573) 751-3087.

Address any written communication to my attention at the Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

HAZARDOUS WASTE PROGRAM

A handwritten signature in blue ink, appearing to read "Darrick Steen", with a long horizontal flourish extending to the right.

Darrick Steen, Environmental Engineer
Federal Facilities Section

DS:dd

c: Tim Duggan, Missouri Attorney Generals Office
Larry Erickson, Hazardous Waste Program
Scott Waltrip, Solid Waste Management Program